

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
(Bid Protest)**

AUDACIOUS INQUIRY, LLC

Plaintiff,

v.

UNITED STATES,

Defendant.

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Case No.: 24-318 C

Judge

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Audacious Inquiry, LLC, respectfully requests leave to file its Complaint and documents in support thereof in this bid protest under seal as allowed by Rules of the Court of Federal Claims Appendix C Section III.

Certain portions of Plaintiff’s Complaint in this matter reveal proprietary information. Audacious Inquiry, LLC has contemporaneously filed a motion for a protective order to be issued by the Court in this matter.

Audacious Inquiry, LLC’s Complaint is marked in such a way that confidential, proprietary information is indicated, and is accompanied by a proposed redacted version.

WHEREFORE, Audacious Inquiry, LLC respectfully requests that the Court issue an order granting this motion.

Respectfully submitted,

/s/ Laurence L. Socci

Laurence L. Socci, Esq.

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Counsel for Plaintiff Audacious Inquiry, LLC

Certificate of Service

I hereby certify that on February 29, 2024, I caused copies of the foregoing to be served by electronic mail upon the following:

U.S. Department of Justice
Commercial Litigation Branch
National Courts Section
P.O. Box 480
Ben Franklin Station
Washington, D.C., 20044

Respectfully submitted,

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